

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
EL PASO DIVISION**

UNITED STATES OF AMERICA

Plaintiff,

v.

MARCO ANTONIO VALLEJO, JR.

Defendant.

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No. EP-17-CR-1568 FM

DEFENDANT’S UNOPPOSED MOTION FOR PERMISSION TO TRAVEL

TO THE HONORABLE JUDGE OF SAID COURT:

COMES NOW Defendant MARCO ANTONIO VALLEJO, JR., by and through his attorney of record, Ruben Nunez, and moves this Court to grant him permission to travel to the Republic of Mexico, and would show the Court the following:

I.

The Defendant has been under pretrial release since August 30, 2017, on a \$10,000, 10% Appearance and Compliance Bond. The Defendant has been compliant with all his conditions of release, and has not had any violations.

II.

The Defendant seeks permission from the Court to travel with his family to Ciudad Juarez, Mexico to celebrate “El Dia De Los Reyes” with their extended family. The Defendant’s plans include traveling to Cd. Juarez Saturday morning, spending the night with his relatives, and returning to El Paso Sunday morning at about 10:00 a.m. The Defendant would then report to his Pretrial Services Officer on Monday morning.

III.

The undersigned has conferred with U.S. Pretrial Services Officer Irma Portillo, who has advised the undersigned that the Defendant has been compliant with all his conditions of pretrial release, and that she does not oppose this motion.

IV.

The undersigned has also conferred with Assistant United States Attorney Mallory Rasmussen, who advised the undersigned that she does not oppose this motion.

WHEREFORE THE ABOVE PREMISES CONSIDERED, the Defendant respectfully requested that the Court grant this motion and permit the Defendant to travel to Ciudad Juarez, Chihuahua, Mexico as requested in this motion.

Respectfully submitted,

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/s/ **Ruben Nuñez**
RUBEN NUNEZ
State Bar No. 00794909
Attorney for Defendant

CERTIFICATE OF SERVICE

I, RUBEN NUNEZ, hereby certify that a true and correct copy of the above and foregoing motion was filed on January 3, 2018, with the United States District Clerk for the Western District of Texas using CM/ECF System, which will give notice to the United States Attorney's Office, 700 E. San Antonio, El Paso, Texas 79901.

/s/ *Ruben Nuñez*

RUBEN NUNEZ